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Breaking Silos in Medicine, LLC, and Habib Shamte, M.D.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CF STAFFING SOLUTIONS, LLC, a Nevada
Limited-Liability Company; MAX CASAL, an
individual,

Plaintiffs,

vs.

DISTRICT HEALTHCARE SERVICES, LLC,
a foreign Corporation; BREAKING SILOS IN
MEDICINE, LLC, a foreign corporation;
HABIB SHAMTE, M.D., an individual; DOES I
through X; AND ROE CORPORATIONS
through X, inclusive,.

Defendants.

CASE NO. 2:24-cv-02355-GMN-EJY

(District Court of Clark County Nevada Case
No. A-24-905033-C)

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT**

(First Request)

Pursuant to LR IA 6-1, Plaintiffs CF Staffing Solutions, LLC (“CF Staffing”) and Max
Casal (“Mr. Casal,” together with CF Staffing “Plaintiffs”), by and through their counsel of
record, the Law Office of Hayes & Welsh, and Defendants District Healthcare Services, LLC

1 (“District Healthcare”), Breaking Silos in Medicine, LLC (“Breaking Silos”), and Habib Shamte,
 2 M.D. (“Dr. Shamte,” together with District Healthcare and Breaking Silos, “Defendants”), by
 3 and through their counsel of record, Dickinson Wright PLLC, hereby stipulate as follows:

- 4 1. Defendants filed a Motion to Dismiss to Plaintiffs’ Complaint on December 26, 2024
 5 (ECF No. 3) and a Motion to Dismiss Plaintiffs’ First Amended Complaint on
 6 January 1, 2025 (ECF No. 12).
- 7 2. Plaintiffs filed their Opposition to Defendants’ Motion to Dismiss on March 3, 2025
 8 (ECF No. 20).
- 9 3. On May 2, 2025, the Order Denying Defendants’ Motion to Dismiss was filed and
 10 served (ECF No. 24).
- 11 4. Defendants’ Answer to the First Amended Complaint is currently due May 16, 2025.
- 12 5. The parties have been engaging in settlement discussions before and after this Court’s
 13 Order Denying the Motion to Dismiss.
- 14 6. In an effort to accommodate those discussions and the deadlines set forth in this
 15 litigation, the parties agree that Defendants have until May 23, 2025 to Answer the
 16 First Amended Complaint.
- 17 7. This is the first stipulation for extension of time for Defendants to file an Answer to
 18 the First Amended Complaint.
- 19 8. This Stipulation is made in good faith and not for purposes of delay.

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 21
 22 DATED May 13, 2025

DATED May 13, 2025

23 LAW OFFICE OF HAYES & WELSH

DICKINSON WRIGHT, PLLC

24 /s/ Martin L. Welsh

/s/ Brooks T. Westergard

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3 *Attorneys for Plaintiffs, CF Staffing*
4 *Solutions, LLC and Max Casal*

Attorneys for Defendants, District
Healthcare Services, LLC; Breaking Silos
In Medicine, LLC and Habib Shamte,
M.D.

6 IT IS SO ORDERED.

8 Dated: May 13, 2025.

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11 UNITED STATES MAGISTRATE JUDGE
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